

H. Chuck Cooper
Ashland Inc.
P. O. Box 2219
Columbus, OH 43216

Re: 141-12345-00125
Administrative Amendment to
FESOP 141-5525-00125

Dear Mr. Cooper:

Ashland Chemical Company was issued a federally enforceable state operation permit (FESOP) on December 9, 1996 for a chemical storage and distribution terminal located at 1817 South Indiana Avenue, South Bend, IN 46613-1299. A letter requesting a revision was received on June 6, 2000. The request was made to add a soil vapor extraction and air sparging system. Pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended as follows:

A.2 Emission Units and Pollution Control Summary [326 IAC 2-8-3(c)]

The stationary source consists of the following emission units and pollution control devices:

- a) fourteen (14) organic liquid storage tanks, known as T-1 - T-6, T-8 - T-13, T-17 and T-24, capacity: 10,600 gallons, each.
- b) one (1) organic liquid storage tank, known as T-71, capacity: 2,200 gallons.
- c) one (1) organic liquid storage tank, known as T-74, capacity: 2,100 gallons.
- d) two (2) organic liquid storage tanks, known as T-72 and T-73, capacity: 2,000 gallons, each.
- e) one (1) organic liquid storage tank, known as T-16, capacity: 20,500 gallons.
- f) three (3) organic liquid storage tanks, known as T-18, T-19 and T-23, capacity: 6,000 gallons, each.
- g) one (1) organic liquid storage tank, known as T-22, capacity: 8,700 gallons.
- h) one (1) organic liquid storage tank, known as T-25, capacity: 20,100 gallons.
- i) one (1) organic liquid blend tank, known as T-20, capacity: 3,500 gallons.
- j) one (1) ~~one (1)~~ bay tank wagon/wagon/transport unloading/loading rack for organic liquids.
- k) one (1) organic liquid container filling area.
- l) one (1) organic liquid rail car unloading area.

- m) one (1) hydrochloric acid storage tank, known as T-29, capacity: 7,900 gallons.
- n) one (1) ~~one (4)~~ bay tank wagon/wagon/transport unloading/loading rack for inorganic liquids.
- o) one (1) inorganic container filling area for hydrochloric acid.
- p) **one (1) soil vapor extraction and air sparging system, known as SVE-AS, with a capacity of six (6) wells.**

Furthermore, Section D.2 is hereby added to read as follows:

SECTION D.2 FACILITY OPERATION CONDITIONS

one (1) soil vapor extraction and air sparging system, known as SVE-AS, with a capacity of six (6) wells.

Emissions Limitations [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The VOC emissions are less than two (2) tons per month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) do not apply.

D.2.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1]

The combined HAP emissions are less than two (2) tons per month, and individual HAP emissions are less than 0.8 tons per pollutant per month. Therefore, the maximum achievable control technology (MACT) requirement in 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM reserves the right to require compliance testing if necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.2.4 Record Keeping Requirements

There are no specific record keeping requirements for this facility.

D.2.5 Reporting Requirements

There are no specific reporting requirements for this facility.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Allen R. Davidson at (800) 451-6027, press 0 and ask for extension 3-5693, or dial (317) 233-5693.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
ARD

cc: File - St. Joseph County
U.S. EPA, Region V
St. Joseph County Health Department
IDEM - Northern Regional Office
Air Compliance Section Inspector - Rick Reynolds
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR MANAGEMENT**

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 1-800-451-6027

**Ashland Chemical Company, A Division of Ashland, Inc.
1817 West Indiana Avenue
South Bend, Indiana 46613**

Ashland Chemical Company, A Division of Ashland, Inc. is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F 141-5525-00125	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: December 9, 1996
First Administrative Amendment 141-12345-00125	Pages Amended: 3-4, 22
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

A.1 General Information [326 IAC 2-8-3(c)]

The Permittee owns and operates a chemical storage and distribution source.

Responsible Official: Michael L. Rademacher
Source Address: 1817 West Indiana Avenue, South Bend, Indiana
Mailing Address: 1817 West Indiana Avenue, South Bend, Indiana
SIC Code: 5169
County Location: St. Joseph
County Status: Attainment for Ozone, CO, PM₁₀, SO₂, NO_x, Lead
Nonattainment for TSP
Source Status: Minor Source, PSD Rules;
Synthetic Minor Source, Part 70 Permit Program

A.2 Emission Units and Pollution Control Summary [326 IAC 2-8-3(c)]

The stationary source consists of the following emission units and pollution control devices:

- a) fourteen (14) organic liquid storage tanks, known as T-1 - T-6, T-8 - T-13, T-17 and T-24, capacity: 10,600 gallons, each.
- b) one (1) organic liquid storage tank, known as T-71, capacity: 2,200 gallons.
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- f) three (3) organic liquid storage tanks, known as T-18, T-19 and T-23, capacity: 6,000 gallons, each.
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- h) one (1) organic liquid storage tank, known as T-25, capacity: 20,100 gallons.
- i) one (1) organic liquid blend tank, known as T-20, capacity: 3,500 gallons.
- j) one (1) bay tank wagon/wagon/transport unloading/loading rack for organic liquids.
- k) one (1) organic liquid container filling area.
- l) one (1) organic liquid rail car unloading area.
- m) one (1) hydrochloric acid storage tank, known as T-29, capacity: 7,900 gallons.
- n) one (1) bay tank wagon/wagon/transport unloading/loading rack for inorganic liquids.
- o) one (1) inorganic container filling area for hydrochloric acid.
- p) one (1) soil vapor extraction and air sparging system, known as SVE-AS, with a capacity of six (6) wells.

A.3 Insignificant Activities [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- 1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- 2) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hr, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hr.
- 3) Corrosive (inorganic) liquid container filling containing less than 1% by weight of VOCs excluding HAPs and excluding hydrochloric acid.
- 4) Process vessel degassing and cleaning to prepare for internal repairs.
- 5) Paved and unpaved roads and parking lots with public access.
- 6) Underground stormwater tank.
- 7) Blowdown for any of the following: light glass, boiler, compressors, pumps, and cooling tower.
- 8) QA/QC Lab as defined in 326 IAC 2-7-1 (20) (C).

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B

GENERAL CONDITIONS

- B.1 General Requirements [IC 13-15] [IC 13-17] (Prior to July 1, 1996: IC 13-7 and IC 13-1-1)
The permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.
- B.2 Definitions [326 IAC 2-8-1]
Terms in this permit shall have the meaning assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11 (prior to July 1, 1996, IC 13-7-2, IC 13-1-1-2), 326 IAC 1-2, and 326 IAC 2-7 shall prevail.
- B.3 Permit Term [326 IAC 2-8-4(2)]
This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-5-5-3 (prior to July 1, 1996, IC 13-7-10-2.5), of the permit.
- B.4 Enforceability [326 IAC 2-8-6]
a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.
- B.5 Termination of Right to Operate [326 IAC 2-8-9]
The expiration of this permit terminates the Permittee's right to operate unless a timely and complete renewal application has been submitted consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-7.
- B.6 Severability [326 IAC 2-8-4(4)]
a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
b) Indiana rules from 326 IAC quoted in conditions in this permit are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard.
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
This permit does not convey any property rights of any sort or any exclusive privilege.
- B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]
a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management,
Permits Branch, Office of Air Management,
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

St. Joseph County Health Department
County - City Building, Room 914
South Bend, IN 46601-1870

- b) The Permittee shall also provide additional information as requested by IDEM, OAM, to determine the compliance status of the source in accordance with 326 IAC 2-8-5(a).
- c) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that the IDEM, OAM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- d) Upon written request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to both the U.S. EPA and IDEM, OAM, along with a claim of confidentiality.

Such confidentiality claims shall meet the requirements of 40 CFR Part 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM).

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

- 1) enforcement action;
- 2) permit termination, revocation and reissuance or modification; and
- 3) denial of a permit renewal application.

- b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]

Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

A responsible official is defined at 326 IAC 2-7-1(33).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- a) The Permittee shall annually certify that the source has complied with the terms and conditions contained in this permit, including emission limitations, standards, and work practices. The certification shall be submitted April 15 to:

Indiana Department of Environmental Management,
Compliance Data Section, Office of Air Management,
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

St. Joseph County Health Department
County - City Building, Room 914
South Bend, IN 46601-1870

and

U.S. Environmental Protection Agency (EPA), Regional Administrator, Region V
Air and Radiation Division, Regulation Development Branch (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- b) This annual compliance certification report required by this permit shall be timely if:
 - 1) Delivered by U.S. mail and postmarked on or before the date it is due; or
 - 2) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.
- c) The annual compliance certification report shall include the following:
 - 1) The identification of each term and condition of this permit that is the basis of the certification;
 - 2) The compliance status;
 - 3) Whether compliance was continuous or intermittent;
 - 4) The methods used for determining the compliance status of the source, currently and over the reporting period; and
 - 5) Such other facts as IDEM, OAM, may require to determine the compliance status of the source.

B.13 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

- a) The Permittee shall prepare, maintain and implement operation and Preventive Maintenance Plans as necessary including the following information on each:
 - 1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - 2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - 3) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;
 - 4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and

- 5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.
- b) Preventive Maintenance Plans shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.14 Emergency Provision [326 IAC 2-8-12]

- a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided as follows:
- b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- 1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- 2) The permitted facility was at the time being properly operated;
- 3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements of this permit;
- 4) The Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency occurrence by telephone or facsimile;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management) or,

Telephone No.: 317-233-0178

Facsimile No.: 317-233-5967

St Joseph County Health Department Telephone No. 219-235-9775

St Joseph County Health Department Facsimile No. 219-235-7558

- 5) The Permittee submitted written notice or by facsimile of the emergency to:

Indiana Department of Environmental Management,
Compliance Branch, Office of Air Management,
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

St. Joseph County Health Department
County - City Building, Room 914
South Bend, IN 46601-1870

within two (2) working days of the time when emission limitations were exceeded due to the emergency. The notice shall fulfill the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- A) A description of the emergency;
 - B) Any steps taken to mitigate the emissions; and
 - C) Corrective actions taken.
- 6) The Permittee immediately took all reasonable steps to correct the emergency.
- c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- d) This emergency provision supersedes any emergency or upset provision contained in 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- e) IDEM, OAM, may require that the preventive maintenance plan required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- f) Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- g) Operations may continue during an emergency only if the following conditions are met:
- 1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - 2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - A) the Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - B) continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in clause (B) above.

- B.15 Deviations from Permit Requirements and/or Conditions [326 IAC 2-8-4(3)(C)(ii)]
Deviations from requirements, (for emergencies see Condition B.14 - Emergency Provision) the probable cause of such deviations, and any corrective actions or preventive measures taken shall be reported to:

Indiana Department of Environmental Management,
Compliance Branch, Office of Air Management,
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

St. Joseph County Health Department
County - City Building, Room 914
South Bend, IN 46601-1870

within ten (10) calendar days from the date of the discovery of the deviation.

Written notification shall be submitted on the attached Deviation Occurrence Reporting Forms.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8(a)]

[326 IAC 2-8-8(b)] [326 IAC 2-8-8(c)]

- a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- b) This permit shall be reopened and revised under any of the circumstances listed in IC 15-15-7-2 (prior to July 1, 1996, in IC 13-7-10-5) or if the commissioner determines any of the following:
 - 1) That it contains a material mistake.
 - 2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - 3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practical. [326 IAC 2-8-8(b)]
- d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include, at minimum, the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(20).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management,
Permits Branch, Office of Air Management,
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

St. Joseph County Health Department
County - City Building, Room 914
South Bend, IN 46601-1870

- b) Timely Submittal of Permit Renewal [326 IAC 2-5-3]
 - 1) The Permittee has a duty to submit a timely and complete permit renewal application. A timely renewal application is one that is:
 - A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - B) Delivered by U.S. mail and postmarked on or before the date it is due; or
 - C) Delivered by any other method if it received and stamped by IDEM, OAM, on or before the date it is due.
 - 2) If IDEM, OAM fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- c) Right to Operate After Application of Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

- a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
- b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-8-10(b).
- c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- b) Minor permit modification procedures shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).

- c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

- a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by the U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]
Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable FESOP's, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable implementation plan (SIP) or in applicable requirements promulgated by the U.S. EPA.

B.22 Operational Flexibility [326 IAC 2-8-15]

- a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - 1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - 2) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed therein as a rate of emissions or in terms of total emissions);
 - 3) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

St. Joseph County Health Department
County - City Building, Room 914
South Bend, IN 46601-1870

and

Regional Administrator, Region V, U.S. Environmental Protection Agency (EPA)
Air and Radiation Division, Regulation Development Branch (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- 4) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review. Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b)(1), (c)(1), and (d).
- b) For each such change, the required written notification shall include the following:
- 1) A brief description of the change within the source;
 - 2) The date on which the change will occur;
 - 3) Any change in emissions; and
 - 4) Any permit term or condition that is no longer applicable as a result of the change.
- c) Emission trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints in section (a) of this condition and those in 326 IAC 2-8-15(c).
- d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7) and subject to the constraints in section (a) of this condition and those in 326 IAC 2-8-15(d)
- B.23 Construction Permit Requirement [326 IAC 2-1]
Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM)

B.24 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of IDEM identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- a) Enter upon the Permittee's premises where a FESOP source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
- b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d) Sample or monitor, at reasonable times, substances or parameters for the purpose of demonstrating compliance with this permit or applicable requirements; and
- e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of demonstrating compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]

B.25 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- a) The Permittee shall pay annual fees to IDEM, OAM, consistent with the fee schedule established in 326 IAC 2-8-16.
- b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.
- c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.
- d) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-0179 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations [326 IAC 2-8-4(1)]

C.1 Opacity

Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

- a) Visible emissions shall not exceed an average of 30% opacity in 24 consecutive readings.
- b) Visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

C.2 Open Burning

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. This is not a federally enforceable condition.

C.3 Operation of Equipment [326 IAC 2-8-5(a)(4)]

- a) All equipment that potentially might emit pollutants into the ambient air shall be properly operated and maintained.
- b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.
- c) The permittee shall perform all necessary maintenance and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times.

Compliance Monitoring [326 IAC 2-8-5(a)(1)]

C.4 Visible Emissions Observations [326 IAC 5]

Unless otherwise noted, whenever a condition in this permit requires the taking of visible emissions, such readings shall be taken in accordance with 326 IAC 5 (Opacity Regulations). Readings shall be taken by a qualified observer when the equipment or process being monitored is operating at normal conditions. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80% of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations readings shall be taken during that part of the operation specified in the unit specific condition prescribing visible emissions.

A six minute set of additional readings shall be taken any time it is noted that the emissions are higher than normal and the reasons, if known, shall be recorded. These readings and records shall continue every daylight hour until the process is either shut down or returns to normal. Any time the required visible emission readings are not taken, the permittee shall document such failure and the reasons thereof. All this information shall be treated as part of the visible emission record in accordance with Condition C.8 - General Record Keeping Requirements, and Condition C.9 - General Reporting Requirements, of this permit.

C.5 Actions Related to Abnormal Visible Emissions

Whenever the visible emission reading taken in conformance with Condition C.4 - Visible Emissions Observations, of this permit exceeds the level specified in a condition of this permit, the troubleshooting contingency actions, which are part of the Preventive Maintenance Plan, prepared in conformance with Condition B.13 - Preventive Maintenance Plan, of this permit, shall be immediately implemented.

Record Keeping and Reporting [326 IAC 2-8-4(3)]

C.6 Emission Reporting [326 IAC 2-6]

- a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management,
Data Support Section, Office of Air Management,
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- b) This annual emission statement required by this permit shall be timely if:
- 1) Delivered by U.S. mail and postmarked on or before the date it is due; or
 - 2) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.

C.7 Monitoring Data Availability

All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions. Records shall be kept of the times that the equipment is not operating. If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality. If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded. At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed 5% of the operating time in any quarter. Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason.

C.8 General Record Keeping Requirements

- a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two years providing they are made available within thirty (30) days after written request.
- b) Records of required monitoring information shall include:
- 1) The date, place, and time of sampling or measurements;

- 2) The dates analyses were performed;
 - 3) The company or entity performing the analyses;
 - 4) The analytic techniques or methods used;
 - 5) The results of such analyses; and
 - 6) The operating conditions existing at the time of sampling or measurement.
- c) Support information shall include:
- 1) Copies of all reports required by this permit.;
 - 2) All original strip chart recordings for continuous monitoring instrumentation;
 - 3) All calibration and maintenance records;
 - 4) All preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it;
 - 5) Relevant work purchases orders;
 - 6) Quality assurance and quality control procedures;
 - 7) Operator's standard operating procedures;
 - 8) Manufacturer's specifications or their equivalent; and
 - 9) Equipment "troubleshooting" guidance.

C.9 General Reporting Requirements

- a) Unless otherwise stated in this permit, monitoring reports shall be submitted semiannually to:
- Indiana Department of Environmental Management,
Compliance Data Section, Office of Air Management,
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- and
- St. Joseph County Health Department
County - City Building, Room 914
South Bend, IN 46601-1870
- b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be timely if:
- 1) Delivered by U.S. mail and postmarked on or before the date it is due; or

- 2) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.
- c) All instances of deviations from any requirements of this permit must be clearly identified in such reports.

SECTION D.1

FACILITY OPERATION CONDITIONS

Fourteen (14) organic liquid storage tanks, known as T-1 - T-6, T-8 - T-13, T-17 and T-24, capacity: 10,600 gallons, each. One (1) organic liquid storage tank, known as T-71, capacity: 2,200 gallons. One (1) organic liquid storage tank, known as T-74, capacity: 2,100 gallons. Two (2) organic liquid storage tanks, known as T-72 and T-73, capacity: 2,000 gallons, each. One (1) organic liquid storage tank, known as T-16, capacity: 20,500 gallons. Three (3) organic liquid storage tanks, known as T-18, T-19 and T-23, capacity: 6,000 gallons, each. One (1) organic liquid storage tank, known as T-22, capacity: 8,700 gallons. One (1) organic liquid storage tank, known as T-25, capacity: 20,100 gallons. One (1) organic liquid blend tank, known as T-20, capacity: 3,500 gallons. One (1) one (1) bay tank wagon/ wagon/ transport unloading/loading rack for organic liquids. One (1) organic liquid container filling area. One (1) organic liquid rail car unloading area. One (1) hydrochloric acid storage tank, known as T-29, capacity: 7,900 gallons. One (1) one (1) bay tank wagon/wagon/transport unloading/loading rack for inorganic liquids. One (1) inorganic container filling area for hydrochloric acid.

Emissions Limitations [326 IAC 2-8-4(1)]

D.1.1 Hazardous Air Pollutants

That the hazardous air pollutant emissions shall be limited as follows:

That the total source throughput shall not exceed 2,000,000 gallons per rolling 12-month period, not including:

Methylene Chloride throughput of no more than 75,000 gallons per rolling 12-month period, and no more than 25,000 gallons of 1, 1, 1-Trichloroethane throughput per rolling 12-month period, and no more than 250,000 gallons of Hydrochloric Acid throughput per rolling 12-month period which is equivalent to limiting HAPs emissions to 9.0 tons and 11.6 tons or less per rolling 12-month period, for single and combined HAPs respectively.

- a) A single hazardous air pollutant (HAP) emissions shall not exceed 9.0 tons per year.
- b) Any combination of HAPs emissions shall not exceed 11.6 tons per year.

Therefore, the requirements of 326 IAC 2-7 do not apply.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.2 Hazardous Air Pollutant (HAP)

That the Permittee shall maintain records at the facility of the materials used that contain any HAPs. The records shall be complete and sufficient to establish compliance with the HAP usage limits and/or HAP emission limits that may be established in this permit. The records shall contain a minimum of the following:

- a) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;
- b) The HAP content (**weight percent**) of each material used;
- c) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable;
- d) Identification of the facility or facilities associated with the usage of each HAP; and
- e) The following operating parameters of the thermal oxidizer:

- 1) Individual HAP capture efficiency;
- 2) Individual HAP destruction efficiency of the control device;
- 3) A description of the data used to establish the capture and destruction efficiency of the thermal oxidizer; and
- 4) Continuous or intermittent temperature and fan amperage readings.

D.1.3 Quarterly Reporting

That a quarterly summary to document compliance with operation conditions numbers D1.1 shall be submitted, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

one (1) soil vapor extraction and air sparging system, known as SVE-AS, with a capacity of six (6) wells.

Emissions Limitations [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The VOC emissions are less than two (2) tons per month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) do not apply.

D.2.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1]

The combined HAP emissions are less than two (2) tons per month, and individual HAP emissions are less than 0.8 tons per pollutant per month. Therefore, the maximum achievable control technology (MACT) requirement in 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM reserves the right to require compliance testing if necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.4 Record Keeping Requirements

There are no specific record keeping requirements for this facility.

D.2.5 Reporting Requirements

There are no specific reporting requirements for this facility.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Ashland Chemical Company, A Division of Ashland, Inc.
Source Address: 1817 West Indiana Avenue, South Bend, Indiana 46613
FESOP No.: F141-5525-00125

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Deviation Occurrence Reporting Form (For Control Equipment Monitoring)
- 9 Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)
- 9 Relocation Notification
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
DEVIATION OCCURRENCE REPORTING FORM**

Source Name: Ashland Chemical Company, A Division of Ashland, Inc.
Source Address: 1817 West Indiana Avenue, South Bend, Indiana 46613
FESOP No.: F141-5525-00125

A separate copy of this report must be submitted for each material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit.
Attach a signed certification to complete this report.

Stack/Vent ID:

Equipment/Operation:

Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit:
(ex: 2500 lb/day, 300 hours/yr, 5000 gallons/month)

Determination Period for this Parameter:
(ex: 365-day rolling sum, fixed monthly rate)

9 Permit Has No Rate Limitations for this Parameter.

Content Restriction for this Parameter:
(ex: maximum of 40% VOC in inks, 0.5% sulfur content)

Demonstration Method for this Parameter:
(ex: MSDS, Supplier, material sampling & analysis)

9 Permit Has No Content Limitations for this Parameter.

Comments:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
AIR COMPLIANCE SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
RELOCATION NOTIFICATION**

Source Name: Ashland Chemical Company, A Division of Ashland, Inc.

Source Address: 1817 West Indiana Avenue, South Bend, Indiana 46613

FESOP No.: F141-5525-00125

A separate copy of this notification must be submitted for each emission unit/pollution control equipment that is relocated. Attach a signed Certification to complete this Notification.

This is only for relocation of equipment within a source.
Relocation to another source or site requires a construction permit.

Emission Unit	Date Relocated	Original Location	New Location
Reason for Relocation:			

**OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Ashland Chemical Company, A Division of Ashland, Inc.
Source Address: 1817 West Indiana Avenue, South Bend, IN 46613
FESOP No.: F 141-5525-00125
Facility: Storage and Blending Tanks
Parameter: Individual and Total HAPS
Limit: Throughput of 2,000,000 gallons per rolling 12-month period, not including:
Methylene Chloride Throughput of 75,000 gallons per rolling 12-month period,
1, 1, 1-Trichloroethane Throughput of 25,000 gallons per rolling 12-month period,
and Hydrochloric Acid Throughput of 250,000 gallons per rolling 12-month period.
Equivalent to HAPs emissions of 9.0 tons and 11.6 tons or less per rolling 12-month period,
single and combined HAPs respectively

Tank: _____ Year: _____

Month	Throughput (gal/month)	Single HAP (Emissions This Month (tons)	Single HAP (Emissions Last 12 Months (tons)	Month	Throughput (gal/month)	Total HAPS Emissions This Month (tons)	Total HAPS Emissions Last 12 Months (tons)
1				1			
2				2			
3				3			
4				4			
5				5			
6				6			
7				7			
8				8			
9				9			
10				10			
11				11			
12				12			
				no. of deviations			

- 9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____
9 Attached are supporting spreadsheets.

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____